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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: 23ANDME, INC., CUSTOMER
DATA SECURITY BREACH LITIGATION

This Document relates to ALL ACTIONS

Case No.: 3:24-md-03098-EMC

MDL No. 3098

Hon. Edward M. Chen

**SUGGESTIONS IN SUPPORT OF SPECIAL
SETTLEMENT MASTER**

Pursuant to the Court's Pretrial Order No. 1 (ECF 11), Plaintiffs Monica Santana, Paula Kleynburd, Bonnie Eden, Daniel Pinho, Thomas Seawright, Pamela Zager-Maya, Adriane Farmer, Harold Velez, and Brianna Sorenson suggest that the Court might proceed in any of the following ways:

1. Randall Wulff, Esq¹. has been actively involved in the mediation efforts to date. We recommend the Court permit Mr. Wulff to continue his efforts in the near term.
2. If a proposed resolution is not reached within sixty to ninety days through Mr. Wulff's efforts, we recommend the Court consider appointing Chief Magistrate Judge Donna M. Ryu or Magistrate Judge Laurel Beeler (who both have familiarity with this matter) as Special Settlement Master. The Court is well aware of their qualifications, and they are well versed in the Northern District of California's expectations and requirements as they relate to class action settlements presented for approval.
3. As a further alternative, we suggest that the Hon. Diane M. Welsh (Ret.)² of JAMS would be an excellent Special Settlement Master for this particular case. Judge Welsh has substantial experience in mediating privacy and data breach cases, as well as other large and complex matters. Her success as a mediator has earned her the respect of the parties who come before her in substantial and often contentious litigation cases.

¹ <https://www.wqsadr.com/about/randall-wulff/>

² <https://www.jamsadr.com/welsh/?tab=bio>

1 Dated: May 20, 2024

Respectfully submitted,

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